

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JAMES J. MCNULTY,  
Plaintiff

v.

GAP, INC.,  
Defendant

Civil Action No. 05-11250-NMG

**MOTION TO EXTEND THE DEADLINE  
FOR DEFENDANT'S RESPONSE TO PLAINTIFF'S COMPLAINT**

The Defendant, Gap, Inc., hereby moves for an additional thirty (30) days in which to respond to Plaintiff's Complaint, up to and including July 21, 2005. As grounds for its motion, Defendant states that the additional time is necessary to prepare an appropriate response.

**CERTIFICATION OF CONFERENCE – LOCAL RULE 7.1**

Gap, Inc. certifies that it attempted to confer with *pro se* Plaintiff about this Motion by calling him twice during the week ending June 17, 2005 and on June 20, 2005, at the two phone numbers provided on Plaintiff's complaint, 508-790-9203 and 508-775-8658, and by leaving both a detailed voicemail message and telephone message for Plaintiff at the second phone number, 508-775-8658. Plaintiff has not returned these calls.

Respectfully submitted,

GAP, INC.  
By its attorneys,

/s/ Joan Ackerstein  
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Dated: June 21, 2005